

## **REMARKS**

Applicants respectfully request reconsideration of the rejections and objections set forth in the Office Action dated March 9, 2007.

### **Summary**

Claims 11, 14 – 26, and 41 are currently pending.

Claims 11 and 18 are currently amended.

Claim 41 is added

### **Allowable Subject Matter**

The Examiner indicated that Claim 26 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

### **Claim Rejections – 35 U.S.C. § 112, second paragraph**

Claims 18 was rejected pursuant to 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Applicant has amended claim 18 to obviate the claim rejection pursuant to 35 U.S.C. § 112, second paragraph. Applicant submits that claim 18 is in condition for allowance and respectfully request allowance thereof.

### **Claim Rejections**

Claims 11, 17, 18 and 20 – 24 were rejected pursuant to 35 U.S.C. § 102(b) as being anticipated by Kameyama et al. (U.S. Patent No. 6,339,501). Claims 11, 17, 20, and 21 were rejected pursuant to 35 U.S.C. § 102(b) as being anticipated by Iijima (U.S. patent No. 6,124,905). Claims 11 – 20 and 22 – 25 were rejected pursuant to 35 U.S.C. § 103(a) as being unpatentable over Applicant's Related Art (ARA) in view of Kameyama et al.

In regards to the claim rejections pursuant to 35 U.S.C. § 102(b), Applicant has amended claim 11 to incorporate dependent claims 12 – 13.

In regards to the claim rejections pursuant to 35 U.S.C. § 103(a), Claim 11 recites, *inter alia*, the light-diffusion layer directly contacts a surface of the third passivation layer.

As stated by the Examiner in the Office Action dated February 2, 2007, ARA fails to disclose “a light-diffusion layer disposed in contact with the second polarizing plate 14b (third passivation layer 28)” (page 4). Accordingly, ARA fails to disclose the light-diffusion layer directly contacts a surface of the third passivation layer.

Kameyama et al. fail to disclose the light-diffusion layer directly contacts a surface of the third passivation layer. Kameyama et al. teach a contrary arrangement. Kameyama et al. teach, “[a]s shown in FIG. 4, the liquid-crystal display device is formed so that the fine concave-convex structure surface 11 of the polarizing member 1 is disposed on the surface light source 8 side” (col. 8, lines 35 – 38). In other words, as shown in Figure 4, a polarizing member 1 is disposed between the polarizing plate 3 and the concave-convex structure surface 11. As shown in Figure 1, an adhesive layer 2 and a polarizing member 1 are disposed between the concave-convex structure surface 11 and polarizing plate 3.

The cited references, either alone or in combination, fail to disclose or suggest the light-diffusion layer directly contacts a surface of the third passivation layer. Therefore, claim 11 is allowable over the cited references.

Claim 11 is also allowable over the cited references because it would not have been obvious to combine the teachings of ARA and Kameyama et al. The Examiner suggests that “it would have been obvious to a person of ordinary skill [in] the art in view of Kameyama et al to employ in the LCD device of ARA Figs. 1 and 2 a light-diffusion layer disposed in contact with the second polarizing plate 14b (the third passivation layer 28) for obtaining a large area LCD device which is thin” (Office Action dated March 9, 2007; page 4). Applicant respectfully disagrees with this interpretation. Kameyama et al. teach a polarizing member layer 1 with a concave convex structure surface 11. To combine the teachings, as suggested by the Examiner, the polarizing member layer 1 and the concave convex structure surface 11 would have to be added to the third passivation layer in ARA. One of ordinary skill

in the art would understand that adding the polarizing member layer 1 to the third passivation layer would increase the size of the LCD device. In other words, under the Examiner's interpretation, not only would the concave convex structure surface 11 be added to the third passivation layer, the entire polarizing member 11 would have to be added. This increases size. Therefore, claim 11 is allowable over the cited references because it would not have been obvious to combine the teachings.

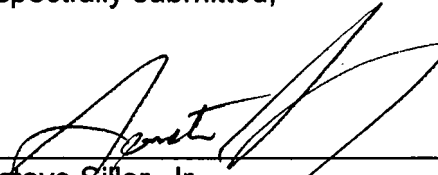
### **New Claim**

Claim 41 is added. Claim 41 finds support in paragraph [0043] of the originally filed specification. Claim 41 recites features that are similar to those discussed above for the allowable features recited in claim 11. Further features of claim 41 are allowable over the cited references. For example, claim 41 recites, inter alia, the thin layer is thinner than the third passivation layer. ARA fail to disclose a thin layer between the third passivation layer and the light diffusion layer. Kameyama et al. teach, as shown in both Fig. 1 and 4, that the polarizing member 1 is the same size as the polarizing plate 3. The cited references, either alone or in combination, fail to disclose the thin layer is thinner than the third passivation layer. Therefore, claim 41 is allowable over the cited references.

## CONCLUSION

In view of the above, Applicants respectfully submit that the pending claims are in condition for allowance and seek an allowance thereof. If for any reason the Examiner is unable to allow the application in the next Office Action and believes that a telephone interview would be helpful to resolve any remaining issues, he is respectfully requested to contact the undersigned attorney or agent.

Respectfully submitted,



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